

May 23, 2018

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**RE: SES and Intelsat Notice of *Ex Parte* Presentation
GN Docket Nos. 17-183, 18-122**

Dear Ms. Dortch:

On May 21, 2018, representatives of SES and Intelsat met with Rachael Bender, Wireless and International Advisor to Chairman Pai. Participants in the meeting on behalf of SES were Gerald Oberst, President of SES Americom, Inc. and the undersigned, outside counsel to SES; for Intelsat, Susan Crandall, Associate General Counsel, Intelsat; Hazem Moakkit, Vice President, Spectrum Strategy, Intelsat; and Gregg Elias, Wiley Rein LLP, outside counsel to Intelsat.

The joint, market-based proposal of Intelsat, SES and Intel will make spectrum in the 3.7-4.2 GHz band available for mobile broadband use while protecting critical Fixed Satellite Service (“FSS”) operations. In the meeting, the Parties explained their detailed and ongoing analysis of the multiple complex steps that would be needed to effectuate this proposal, resulting in their proposed clearing target and time frame. They noted the range of tools needed and the difficulties inherent in making the required changes while maintaining services for their customers, and the technical challenges of optimizing compatibility between 5G transmissions and the remaining FSS operations in the band.

Specifically, Intelsat and SES each separately presented confidential and competitively sensitive information (without the presence of the other company) demonstrating the intricate methods and tools each company will utilize to groom existing customers out of spectrum coordinated for mobile use. Intelsat and SES each explained that not all C-band satellites are fungible and that their satellites used to distribute video programming are already very heavily utilized.

SES presented a report on: (a) its North America C-band satellite loading per application, (b) its historic, current, and forecasted demand for North America video C-band, and (c) the SES internal plan to make 100 MHz (plus the necessary transition band) available for mobile use within three years of a final Commission order. In this context, SES addressed the complicated tools that it would utilize to implement the proposal, including regrooming traffic, adding more satellites, upgrading satellite reception through filters and mitigation techniques, and possibly relocating or fiberizing a few cable head ends.

Likewise, Intelsat presented a snapshot of the current loading of its cable arc satellites and explained how that loading could be adjusted to clear the relevant number of transponders in an 18-36 month time period, while still maintaining the high quality of service to existing video distribution customers. Intelsat discussed use of the same tools described above, including some that could be used to clear more spectrum, but which would be substantially costlier and require more time.

The presentations reinforced that the 100 MHz clearing target for terrestrial mobile use is what each operator can accomplish reasonably within 18-36 months following a final Commission order, while ensuring the continued availability of highly reliable service to existing video customers. The ability to clear additional spectrum in the future beyond that amount, while still maintaining high quality video distribution and other services to customers, would be substantially more expensive and time consuming.

This notice is filed pursuant to FCC Rule 1.1206; please contact the undersigned with any questions regarding this matter.

Respectfully submitted,

/s/ Michele C. Farquhar

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cc: Rachael Bender